

ORIGINAL

James Lee (JL-5641)
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Citigroup Center
153 East 53rd Street
New York, New York 10022-4611
Telephone: (212) 446-4800
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARY M. BREWER,

Plaintiff,

- against -

GENERAL MOTORS INVESTMENT
MANAGEMENT CORPORATION, et al.,

Defendants.

Case No.: 07 CV 2928 (BSJ)

**NOTICE OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

FILED
U.S. DISTRICT COURT
2007 SEP 11 PM 3:52

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District
Courts for the Southern and Eastern Districts of New York, I, James Lee, a member in good
standing of the bar of this Court, hereby moves for an Order allowing the admission *pro hac vice*
of:

Applicant's Name: Robert J. Kopecky
Firm name: Kirkland & Ellis LLP
Address: 200 East Randolph Drive
City / State / Zip: Chicago, Illinois 60601-6636
Phone Number: (312) 861-2000
Fax Number: (312) 861-2200

Applicant's Name: Timothy A. Duffy
Firm name: Kirkland & Ellis LLP
Address: 200 East Randolph Drive
City / State / Zip: Chicago, Illinois 60601-6636
Phone Number: (312) 861-2000
Fax Number: (312) 861-2200

Applicant's Name: John W. Reale
Firm name: Kirkland & Ellis LLP
Address: 200 East Randolph Drive
City / State / Zip: Chicago, Illinois 60601-6636
Phone Number: (312) 861-2000
Fax Number: (312) 861-2200

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Applicant's Name: Colleen Patricia Sorensen
Firm name: Kirkland & Ellis LLP
Address: 200 East Randolph Drive
City / State / Zip: Chicago, Illinois 60601-6636
Phone Number: (312) 861-2000
Fax Number: (312) 861-2200

Robert J. Kopecky, Timothy A. Duffy and Colleen Patricia Sorensen are members in good standing of the Bar of the State of Illinois, and John W. Reale is a member in good standing of the Bars of Illinois and Massachusetts. There are no pending disciplinary proceedings against Robert J. Kopecky, Timothy A. Duffy, John W. Reale, or Colleen Patricia Sorensen in any state or Federal court.

Dated: August 14, 2007

New York, New York


James Lee (JL-5641)

KIRKLAND & ELLIS LLP
Citigroup Center
153 East 53rd Street
New York, New York 10022-4611
Telephone: (212) 446-4800
Facsimile: (212) 446-4900

Attorney for Defendant General Motors
Investment Management Corporation

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARY M. BREWER,

Plaintiff,

- against -

GENERAL MOTORS INVESTMENT
MANAGEMENT CORPORATION, et al.,

Defendants.

Case No.: 07 CV 2928 (BSJ)

**AFFIDAVIT OF JAMES LEE IN
SUPPORT OF MOTION TO ADMIT
COUNSEL *PRO HAC VICE***

STATE OF NEW YORK)
)
COUNTY OF NEW YORK) ss.:

JAMES LEE, being duly sworn, hereby deposes and says as follows:

1. I am James Lee, counsel for Defendant in the above captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Defendant's motion to admit Robert J. Kopecky, Timothy A. Duffy, John W. Reale, and Colleen Patricia Sorensen as counsel *pro hac vice* to represent Defendant in this matter.
2. I am a member in good standing of the bar of the New York, and was admitted to practice law on June 27, 2006. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Robert J. Kopecky and Timothy A. Duffy since October 1, 2005. I have known John W. Reale and Colleen Patricia Sorensen since June 11, 2007.
4. Applicants are attorneys at Kirkland & Ellis LLP, 200 East Randolph Drive, Chicago, Illinois, 60601-6636.
5. I have found Robert J. Kopecky, Timothy A. Duffy, John W. Reale, and Colleen Patricia Sorensen to be skilled attorneys and persons of integrity. They are experienced in Federal practice and are familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move the admission of Robert J. Kopecky, Timothy A. Duffy, John W. Reale, and Colleen Patricia Sorensen, *pro hac vice*.
7. I respectfully submit a proposed order gaining the admission of Robert J. Kopecky, Timothy A. Duffy, John W. Reale, and Colleen Patricia Sorensen, *pro hac vice*, which is attached hereto as Exhibit A.
8. I respectfully submit certificates of good standing on behalf of Robert J. Kopecky, Timothy A. Duffy, John W. Reale, and Colleen Patricia Sorensen, which are attached hereto as Exhibit B.

WHEREFORE it is respectfully requested that the motion to admit Robert J. Kopecky, Timothy A. Duffy, John W. Reale, and Colleen Patricia Sorensen, *pro hac vice*, to represent Defendant in the above captioned matter, be granted.

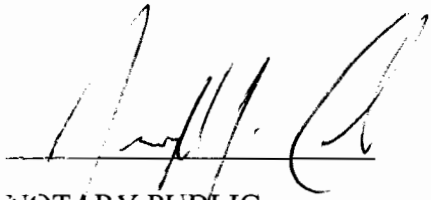
Dated: August __, 2007
New York, New York



James Lee

Sworn to before me

the 14th day of August, 2007



NOTARY PUBLIC

JOSEPH J. CALI
Notary Public, State of New York
No. 01CA5015323
Qualified in New York County
Commission Expires July 19, 2007

CERTIFICATE OF SERVICE

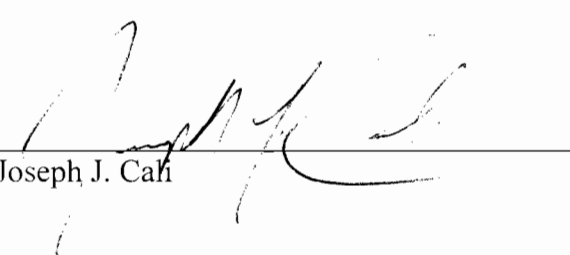
I, Joseph J. Cali, the undersigned, certify under penalty of perjury, that on this 14th day of August, 2007, I caused a true and correct copy of the attached Notice of Motion to Admit Counsel *Pro Hac Vice* and Affidavit of James Lee in Support Motion to Admit Counsel *Pro Hac Vice*, with Exhibits A and B attached thereto, to be served by prepaid first class mail upon:

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Rosen Preminger & Bloom LLP
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Joseph J. Cali

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARY M. BREWER,

Plaintiff,

- against -

GENERAL MOTORS INVESTMENT
MANAGEMENT CORPORATION, et al.,

Defendants.

Case No.: 07 CV 2928 (BSJ)

**ORDER FOR ADMISSION *PRO HAC*
*VICE***

Upon the motion of James Lee, attorney for General Motors Investment Management Corporation and said sponsor attorney's affidavit of support;

IT IS HEREBY ORDERED that

Applicant's Name: Robert J. Kopecky
Firm Name: Kirkland & Ellis LLP
Address: 200 East Randolph Drive
City / State / Zip: Chicago, Illinois 60601-6636
Telephone / Fax: (312) 861-2000/(312) 861-2200
Email Address: rkopecky@kirkland.com

Applicant's Name: Timothy A. Duffy
Firm Name: Kirkland & Ellis LLP
Address: 200 East Randolph Drive
City / State / Zip: Chicago, Illinois 60601-6636
Telephone / Fax: (312) 861-2000/(312) 861-2200
Email Address: tduffy@kirkland.com

Applicant's Name: John W. Reale
Firm Name: Kirkland & Ellis LLP
Address: 200 East Randolph Drive
City / State / Zip: Chicago, Illinois 60601-6636
Telephone / Fax: (312) 861-2000/(312) 861-2200
Email Address: jreale@kirkland.com

Applicant's Name: Colleen Patricia Sorensen
Firm Name: Kirkland & Ellis LLP
Address: 200 East Randolph Drive
City / State / Zip: Chicago, Illinois 60601-6636
Telephone / Fax: (312) 861-2000/(312) 861-2200
Email Address: csorensen@kirkland.com

are admitted to practice *pro hac vice* as counsel for General Motors Investment Management Corporation in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at www.nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:

New York, New York

United States District Judge

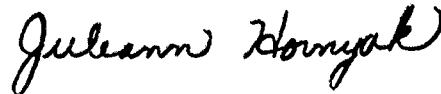
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Robert J. Kopecky

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 26, 1979 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Thursday, August 16, 2007.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

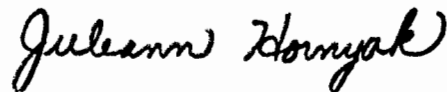
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Timothy A. Duffy

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 17, 1994 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Thursday, August 16, 2007.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

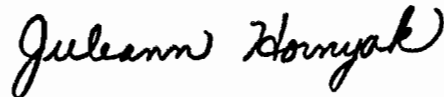
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

John William Reale

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on June 1, 2004 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Thursday, August 16, 2007.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

BE IT REMEMBERED, that at the Supreme Judicial Court holden at Boston within and for said County of Suffolk, on the **seventeenth** day of **December** A.D. **2002**, said Court being the highest Court of Record in said Commonwealth:

John William Reale

being found duly qualified in that behalf, and having taken and subscribed the oaths required by law, was admitted to practice as an Attorney, and, by virtue thereof, as a Counsellor at Law, in any of the Courts of the said Commonwealth: that said Attorney is at present a member of the Bar, and is in good standing according to the records of this Court*.

In testimony whereof, I have hereunto set my hand and affixed the seal of said Court, this **twenty-third** day of **August** in the year of our Lord **two thousand and seven**.




MAURA S. DOYLE, Clerk

* Records of private discipline, if any, such as a private reprimand imposed by the Board of Bar Overseers or by any court, are not covered by this certification.

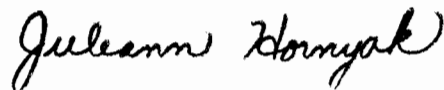
Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Colleen Patricia Sorensen

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 10, 2005 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto
placed my hand and affixed the seal
of said Supreme Court, at Springfield,
in said State, this Thursday, August 16, 2007.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk